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CENTRAL DISTRICT OF CALIFORNIA
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7 **UNITED STATES DISTRICT COURT FOR**
8 **THE CENTRAL DISTRICT OF CALIFORNIA**

9 **WESTERN DIVISION**

11 **TODD R. G. HILL, et al.,**

13 **Plaintiffs**

14 **vs.**

15 **THE BOARD OF DIRECTORS,**
16 **OFFICERS AND AGENTS AND**
17 **INDIVIDUALS OF THE PEOPLES**
18 **COLLEGE OF LAW, et al.,**

19 **Defendants.**

11 CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

13 **The Hon. Josephine L. Staton**
14 Courtroom 8A, 8th Floor

15 **Magistrate Judge Brianna Fuller Mircheff**
16 Courtroom 780, 7th Floor

17 **PLAINTIFF'S MOTION FOR**
18 **RECONSIDERATION OF COURT'S ORDER**
19 **(DOCKET 248)**

20 **NO ORAL ARGUMENT REQUESTED**

21 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

22 CASE 2:23-CV-01298-JLS-BFM

1 TABLE OF CONTENTS

I.	CLEAR ERROR: COURT'S FAILURE TO APPLY STRICT SCRUTINY STANDARD UNDER STUDENTS FOR FAIR ADMISSIONS (<i>SFFA V. HARVARD</i>)	4
II.	CLEAR ERROR (ALTERNATIVE): FAILURE TO APPLY <i>EX PARTE YOUNG</i> DOCTRINE	5
III.	MANIFEST INJUSTICE: JUDICIAL NOTICE MOTIONS IGNORED	6
IV.	NEWLY CONFIRMED EVIDENCE: STATE BAR'S ADMISSIONS OF RECORDS SUPPRESSION	8
V.	CLEAR ERROR: ELEVENTH AMENDMENT AND IMMUNITY ANALYSIS	9
VI.	UNWARRANTED REQUIREMENT FOR ENTIRELY NEW COMPLAINT IMPOSES UNDUE BURDEN AND CONTRADICTS RULE 8 FINDINGS	10
VII.	UNDUE DELAY IN RULING ON PLAINTIFF'S AMENDMENT MOTIONS CONSTITUTES PROCEDURAL ERROR AND MANIFEST INJUSTICE	11
VIII.	COURT'S APPARENT INTENT AND PROCEDURAL CONSEQUENCES	11
IX.	PROCEDURAL POSTURING SHOULD NOT SHIELD DEFENDANTS FROM ACCOUNTABILITY	12
X.	CONCLUSION	14
STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1	15	
Plaintiff's Proof of Service	15	

16 Cases

<i>AmerisourceBergen Corp. v. Dialysis West, Inc.</i> , 465 F.3d 946, 953 (9th Cir. 2006).....	11
<i>Chambers v. NASCO, Inc.</i> , 501 U.S. 32, 44–46 (1991).....	13
<i>Ex Parte Young</i> , 209 U.S. 123 (1908).....	5
<i>Fisher v. University of Texas at Austin</i> , 579 U.S. 365 (2016)	4
<i>Hafer v. Melo</i> , 502 U.S. 21 (1991).....	9
<i>Lee v. City of Los Angeles</i> , 250 F.3d 668, 689 (9th Cir. 2001).....	7
<i>Students for Fair Admissions, Inc. v. President and Fellows of Harvard College</i> , 600 U.S. ____ (2023)	4
<i>United States v. Wilson</i> , 631 F.2d 118, 119 (9th Cir. 1980)	8
<i>Verizon Maryland Inc. v. Public Service Commission of Maryland</i> , 535 U.S. 635 (2002)	5

24 Rules

Federal Rule of Civil Procedure 1.....	11
Federal Rule of Civil Procedure 15.....	10
Federal Rule of Civil Procedure 8.....	7, 10
Federal Rule of Evidence 201(b)(2).....	8

28 PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

1 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**
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4 TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
5 RECORD:
6

7 Plaintiff Todd R.G. Hill respectfully submits this Motion for Reconsideration of the Court's
8 Order (Docket 248), pursuant to Federal Rule of Civil Procedure 59(e) and Local Rule 7-18, on
9 grounds of clear error, manifest injustice, newly discovered evidence, and overlooked controlling
10 law. The Court's Order (Docket 248) omits essential consideration of Plaintiff's constitutional
11 arguments, particularly the strict scrutiny standard mandated by recent Supreme Court precedent.
12 Additionally, the Order does not engage with critical, newly confirmed evidence, including
13 admissions by the State Bar concerning extensive record suppression, nor does it acknowledge
14 prolonged judicial inaction on pivotal procedural motions. These omissions collectively undermine
15 the fairness and thoroughness required for due process. This motion specifically identifies and
16 addresses these substantial oversights, requesting immediate reconsideration to ensure justice and
17 procedural integrity. The cumulative effect of these omissions severely compromises judicial
18 accuracy and invites unnecessary appellate intervention, undermining both judicial efficiency and
19 fairness.
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22 Plaintiff submits this motion explicitly to preserve critical constitutional and procedural issues
23 for appellate review, ensuring a complete record of the Court's evaluation or oversight. The
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26 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**
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1 omissions detailed herein not only significantly prejudice Plaintiff's due process rights but also
2 directly undermine appellate efficiency, inviting unnecessary appellate review and risking reversal.
3

4 **I. CLEAR ERROR: COURT'S FAILURE TO APPLY STRICT SCRUTINY
5 STANDARD UNDER STUDENTS FOR FAIR ADMISSIONS (*SFFA V. HARVARD*)**

6 The Court's recent Order (Docket 248) entirely omits discussion of the critical constitutional
7 arguments and controlling Supreme Court precedent cited by Plaintiff, namely *Students for Fair*
8 *Admissions, Inc. v. President and Fellows of Harvard College*, 600 U.S. ___ (2023). This controlling
9 precedent mandates strict scrutiny application for claims involving systemic discrimination under
10 Equal Protection. Plaintiff's filings unequivocally invoked this controlling authority, yet the Court's
11 failure to engage constitutes a clear error of law requiring reconsideration.
12

13 Moreover, the Supreme Court has repeatedly emphasized that strict scrutiny is exacting and
14 mandatory in Equal Protection cases involving allegations of discriminatory policies or
15 classifications, as reaffirmed in *Fisher v. University of Texas at Austin*, 579 U.S. 365 (2016).
16

17 The Supreme Court has consistently underscored the necessity of explicit judicial analysis under
18 strict scrutiny, noting that 'strict scrutiny must not be strict in theory but feeble in fact,' *Fisher v.*
19 *University of Texas at Austin*, 579 U.S. 365, 380 (2016). Here, the Court's total omission of any strict
20 scrutiny analysis contravenes this imperative standard and renders its decision subject to significant
21 appellate vulnerability. This failure to engage in a mandatory strict scrutiny analysis explicitly
22 required by Supreme Court jurisprudence not only prejudices Plaintiff but likely constitutes
23 reversible appellate error.
24

25 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

The Court’s omission of analysis under *Students for Fair Admissions, Inc.* directly affects the appellate record. Without explicit engagement of this controlling precedent, appellate courts will be deprived of an essential analysis critical to review. Absent explicit analysis, appellate courts will be compelled to reverse for the absence of this required constitutional scrutiny.

II. CLEAR ERROR (ALTERNATIVE): FAILURE TO APPLY *EX PARTE YOUNG* DOCTRINE

Alternatively, should the Court disagree with Plaintiff's application of the strict scrutiny standard under *SFFA*, the Court nonetheless committed clear error by failing to consider Plaintiff's claims under *Ex Parte Young*, 209 U.S. 123 (1908). Under *Ex Parte Young*, Plaintiff is entitled to seek prospective injunctive relief against state officials acting in violation of federal constitutional rights. The Court's Order (Docket 248) neglects essential factual determinations necessary to evaluate the applicability of this doctrine, including a thorough analysis of individual capacities and ongoing constitutional violations. Such oversight precludes proper judicial analysis and constitutes clear error, warranting reconsideration.

Critically, without conducting the essential factual inquiry into the individual capacities of defendants under *Ex Parte Young*, the appellate record remains incomplete. Appellate precedent consistently mandates such rigorous scrutiny to properly determine the appropriateness of prospective injunctive relief.

Here, as confirmed by the Supreme Court in *Verizon Maryland Inc. v. Public Service Commission of Maryland*, 535 U.S. 635 (2002), rigorous factual analysis into the individual capacities of state

PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

1 officials is essential when determining the applicability of prospective injunctive relief under the *Ex
2 Parte Young* doctrine.
3

4 Appellate precedent mandates that *Ex Parte Young*'s applicability be explicitly analyzed rather
5 than implied. In *Verizon Maryland Inc. v. Public Service Commission*, 535 U.S. 635 (2002), the
6 Supreme Court emphasized that federal courts must actively engage and rigorously evaluate factual
7 bases for prospective injunctive relief claims against state officials. The Court's oversight of this
8 explicit requirement invites appellate reversal and undermines judicial clarity and consistency. The
9 Court's omission of explicit *Ex Parte Young* analysis denies appellate courts a foundational basis to
10 adequately review and assess ongoing constitutional violations. This omission significantly increases
11 appellate vulnerability, as reviewing courts mandate explicit judicial findings to uphold or deny
12 prospective injunctive relief.
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16 **III. MANIFEST INJUSTICE: JUDICIAL NOTICE MOTIONS IGNORED**
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18 Plaintiff's multiple judicial notice filings (Dockets 197, 199, 241), containing crucial evidence
19 exposing significant procedural misconduct and systemic failures, have gone unaddressed. Notably,
20 these documents include the State Bar's admissions of concealing over 16,000 relevant records.
21 Failure to incorporate or even address this evidence severely compromises the fairness of judicial
22 proceedings, resulting in manifest injustice.
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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

1 More importantly, the Magistrate Judge's Report and Recommendation [Dkt. 213] independently
2 found the Third Amended Complaint (TAC) to be in substantial compliance with Rule 8. Defendants
3 did not object to this finding and have continued to rely on Rule 8 arguments to delay discovery.
4

5 By overlooking Plaintiff's extensive judicial notice filings, including admissions of substantial
6 records suppression, the Court has deprived both this Court and any appellate tribunal of a crucial
7 evidentiary foundation necessary for accurate and just adjudication.
8

9 As the Ninth Circuit has clearly articulated, appellate review relies critically on complete and
10 proper judicial notice to ensure accurate adjudication, see *Lee v. City of Los Angeles*, 250 F.3d 668,
11 689 (9th Cir. 2001). The omission of substantive consideration of Plaintiff's judicial notice filings
12 significantly impacts the appellate record.
13

14 The Ninth Circuit expressly cautions against ignoring substantive judicial notice motions, as
15 doing so creates substantial appellate deficiencies and undermines judicial accountability. See *Lee v.*
16 *City of Los Angeles*, 250 F.3d 668, 689 (9th Cir. 2001). Here, the Court's omission of Plaintiff's
17 judicial notice filings severely prejudices both the present judicial record and future appellate review.
18

19 Ignoring or inadequate treatment of these judicial notice filings deprives the appellate tribunal of
20 an essential evidentiary basis necessary for informed and just appellate review.
21

22 The Ninth Circuit's explicit admonition against overlooking judicial notice motions, as
23 demonstrated in *Lee*, emphasizes the critical necessity of addressing all substantive judicial notice
24 requests to avoid appellate reversal.
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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

CASE 2:23-CV-01298-JLS-BFM

1 **IV. NEWLY CONFIRMED EVIDENCE: STATE BAR'S ADMISSIONS OF**
2 **RECORDS SUPPRESSION**

3 Federal Rule of Evidence 201(b)(2) permits judicial notice of facts that are not subject to
4 reasonable dispute because they "can be accurately and readily determined from sources whose
5 accuracy cannot reasonably be questioned."

7 Recent filings, including Plaintiff's Motion for Leave to Conduct Discovery (Docket 241),
8 contain newly acknowledged facts critical to Plaintiff's claims, explicitly confirming extensive
9 records suppression by the State Bar. The Court's oversight of these facts significantly prejudices
10 Plaintiff's ability to fully litigate his claims, demanding reconsideration and judicial
11 acknowledgment.

13 These are proper subjects for judicial notice and essential to resolving whether Defendants are
14 acting in good faith. (*See United States v. Wilson*, 631 F.2d 118, 119 (9th Cir. 1980) (A court may
15 take judicial notice of its own records in other cases, as well as the records of inferior courts in other
16 cases.))

19 The recent admission by the State Bar acknowledging suppression of over 16,000 relevant
20 documents constitutes newly confirmed evidence of systemic governance failures directly relevant to
21 Plaintiff's constitutional claims. Ignoring such unequivocal evidence, which explicitly satisfies FRE
22 201(b)(2), severely prejudices Plaintiff and significantly compromises appellate review.

24 This failure to acknowledge explicit evidence of systematic misconduct severely weakens the
25 judicial record and substantially increases appellate vulnerability. The Court's failure to explicitly

28 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

1 incorporate this undisputed evidence undermines judicial accountability, risks appellate correction,
2 and unjustly prejudices Plaintiff's litigation strategy.
3

4 **V. CLEAR ERROR: ELEVENTH AMENDMENT AND IMMUNITY ANALYSIS**
5

6 The Court's previous immunity rulings have bypassed critical factual determinations required
7 under *Ex parte Young*, 209 U.S. 123 (1908), and *Hafer v. Melo*, 502 U.S. 21 (1991). Necessary
8 factual analysis into individual vs. official capacities, scope of authority, and specific state
9 involvement remains outstanding. The Court's failure to rigorously apply established immunity
10 analysis constitutes clear error and further mandates reconsideration.
11

12 Without conducting detailed factual analysis of the State Bar Defendants' official versus
13 individual capacities, this Court's Order risks appellate reversal on clearly established grounds. The
14 Supreme Court's decisions in *Ex Parte Young* and *Hafer* unequivocally require rigorous individual-
15 capacity analysis, a crucial step omitted in the Court's current Order.
16

17 Furthermore, as mentioned above and as confirmed by the Supreme Court in *Verizon Maryland*
18 *Inc. v. Public Service Commission of Maryland*, 535 U.S. 635 (2002), rigorous factual analysis into
19 the individual capacities of state officials is essential when determining the applicability of
20 prospective injunctive relief under the *Ex Parte Young* doctrine.
21

22 By omitting rigorous individual-capacity analysis, the Court significantly heightens the likelihood
23 of appellate reversal due to fundamental procedural and analytical deficiencies explicitly required by
24 Supreme Court precedent.
25

26 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

1 **VI. UNWARRANTED REQUIREMENT FOR ENTIRELY NEW COMPLAINT**
2 **IMPOSES UNDUE BURDEN AND CONTRADICTS RULE 8 FINDINGS**

3 The Court's explicit acceptance of the Magistrate's Interim Report (Docket 213), which clearly
4 recognized the Third Amended Complaint's substantial compliance with Federal Rule of Civil
5 Procedure 8, directly conflicts with the subsequent unexplained denial of Plaintiff's amendment
6 under Federal Rule of Civil Procedure 15 (Docket 163). By not providing specific justification, the
7 denial appears arbitrary, creating a clear procedural contradiction that prejudices Plaintiff's right to
8 refine and reinforce adequately pleaded claims. The denial, lacking specific rationale in the face of
9 acknowledged compliance, strongly infers procedural error and significantly prejudices Plaintiff's
10 right to clarify and strengthen existing claims.

13 Moreover, the Court's requirement to submit a wholly amended complaint, rather than permitting
14 targeted corrections to specifically identified deficiencies, constitutes an unnecessary procedural
15 obstacle. This requirement contravenes FRCP Rule 1's foundational directive to achieve the just,
16 speedy, and inexpensive determination of litigation, thereby undermining judicial efficiency and
17 fairness. Plaintiff explicitly preserves his objection to ensure a robust and clear appellate record.

20 Appellate jurisprudence consistently disfavors procedural requirements that unnecessarily
21 multiply litigation burdens without clear justification. By compelling Plaintiff to resubmit entirely
22 adequate claims rather than simply correcting explicitly identified deficiencies, the Court imposes an
23 arbitrary burden that contradicts the principles of judicial economy and procedural fairness,
24 necessitating appellate clarification and intervention. This procedural contradiction not only
25 undermines judicial consistency but also establishes clear grounds for appellate correction.

28 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

1 **VII. UNDUE DELAY IN RULING ON PLAINTIFF'S AMENDMENT MOTIONS**
2 **CONSTITUTES PROCEDURAL ERROR AND MANIFEST INJUSTICE**

3 The Court's seven-month delay in ruling on Plaintiff's Proposed Amended Complaint (Dockets
4 163 & 164) not only conflicts with established standards requiring timely adjudication of amendment
5 motions but significantly prejudiced Plaintiff's ability to effectively prosecute this action. Ninth
6 Circuit precedent establishes that undue judicial delay—especially without articulated justification—
7 is itself grounds for procedural reconsideration due to its prejudicial impact on litigants' substantive
8 rights and strategic decision-making. See *AmerisourceBergen Corp. v. Dialysis West, Inc.*, 465 F.3d
9 946, 953 (9th Cir. 2006) (holding that undue delay may justify reconsideration or appellate
10 intervention when it prejudices litigants).

11 Plaintiff explicitly identifies and preserves this procedural error for appellate clarity, as the undue
12 delay significantly undermines judicial efficiency, fairness, and procedural integrity in direct
13 contravention of Federal Rule of Civil Procedure 1.

14 The extensive, unjustified delay in ruling on critical amendment motions clearly contravenes
15 appellate guidance emphasizing timely judicial responsiveness as essential to fair litigation. Such
16 procedural error constitutes a recognized basis for appellate reversal, particularly given Ninth Circuit
17 emphasis on timely judicial determination.

18 **VIII. COURT'S APPARENT INTENT AND PROCEDURAL CONSEQUENCES**

19 Given prolonged judicial inaction and consistent procedural oversights, it appears the Court seeks
20 to delay or avoid direct engagement with Plaintiff's substantive constitutional arguments. Continued
21 avoidance imposes significant appellate risk and procedural vulnerability. Plaintiff explicitly requests
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25 **PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)**

1 that reconsideration be granted to preclude such procedural exposure and to correct clear judicial
2 oversight promptly.
3

4 Continued judicial avoidance or deferral of these substantive constitutional analyses and
5 procedural corrections increases the risk of appellate reversal. An appellate court reviewing such
6 prolonged procedural delays and constitutional omissions would likely identify these as a basis for
7 significant judicial error.

8 The cumulative effect of the Court's repeated avoidance or deferral of substantive constitutional
9 and procedural analyses signals an intent to sidestep the complex and significant constitutional
10 implications raised by Plaintiff. Such avoidance does not merely invite appellate review but ensures
11 it. The Ninth Circuit has consistently reversed trial court decisions precisely because of judicial
12 reticence to engage in necessary constitutional scrutiny and explicit factual inquiry.

13 The Court's apparent strategy of avoiding explicit constitutional adjudication not only
14 undermines the legitimacy of its ruling but substantially heightens the risk of appellate reversal. The
15 Court's repeated procedural omissions signal intentional judicial avoidance, inevitably inviting
16 appellate scrutiny and likely reversal due to substantial and unresolved constitutional and procedural
17 errors.

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**IX. PROCEDURAL POSTURING SHOULD NOT SHIELD DEFENDANTS FROM
22 ACCOUNTABILITY**

23 As the Supreme Court recognized in *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44–46 (1991),
24 “Courts of justice are universally acknowledged to be vested... with power to impose silence, respect,

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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

1 and decorum in their presence, and submission to their lawful mandates,”—a power that becomes
2 essential when a party’s pattern of procedural misrepresentation and evasive filings threatens to
3 undermine the orderly administration of justice.

5 The Supreme Court has clearly articulated that courts possess inherent authority not only to
6 regulate conduct but also to ensure accountability and procedural integrity. *Chambers v. NASCO,*
7 *Inc.*, 501 U.S. 32, 44–46 (1991). Allowing Defendants’ continued procedural posturing undermines
8 judicial authority, compromises record clarity, and frustrates meaningful appellate review.

10 The Court should not permit the litigation to stall further based on rhetorical mischaracterization
11 or failure to adequately address adjudication criteria.
12

Judicial inaction on the PAC (Dockets 163 & 164) has allowed procedural misrepresentations to
13 persist unchecked—an injury that justifies judicial notice and procedural correction under Rule 1’s
14 directive to secure the just, speedy, and inexpensive determination of every action.

16 Procedural posturing and delay tactics by Defendants, if left unchecked by this Court, create a
17 fragmented and deficient appellate record. Immediate correction and explicit judicial engagement are
18 necessary to preserve procedural and substantive integrity for appellate purposes. Allowing
19 procedural gamesmanship and evasion to persist unchecked compromises the court’s credibility,
20 necessitating appellate intervention to restore procedural integrity and judicial accountability.

22 Unchecked procedural posturing and evasion damage judicial legitimacy and virtually guarantee
23 appellate intervention to restore fairness and procedural integrity.
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PLAINTIFF’S MOTION FOR RECONSIDERATION OF COURT’S ORDER (DOCKET 248)

1 **X. CONCLUSION**
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3 Immediate correction by the Court will affirm its commitment to procedural and constitutional
4 accountability, significantly reducing appellate risk and promoting judicial efficiency.
5

6 For the reasons above, Plaintiff respectfully requests the Court grant this Motion for
7 Reconsideration, directly addressing Plaintiff's controlling constitutional arguments, properly
8 acknowledging critical evidence, and promptly rectifying procedural and substantive errors.
9

10 Plaintiff respectfully requests the Court explicitly rectify these errors and omissions to maintain
11 the integrity and completeness of the judicial record for this Court's evaluation and any subsequent
12 appellate review. By explicitly correcting these oversights now, the Court can preserve its own
13 procedural integrity, facilitate meaningful appellate review, and reaffirm adherence to constitutional
14 standards and judicial accountability. Plaintiff respectfully urges immediate corrective action to avoid
15 appellate reversal and preserve judicial resources.
16

17 This Court's immediate action to explicitly address and rectify these errors is essential, as it
18 significantly reduces appellate risk and reaffirms judicial accountability and constitutional adherence.
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20 Plaintiff respectfully submits these requests to ensure procedural fairness, transparency, and
21 adherence to constitutional principles fundamental to the proper administration of justice.
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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

1 Respectfully submitted,
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3 Dated: March 28, 2025
4 Respectfully submitted,

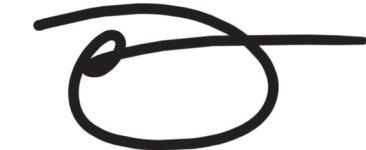
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8 Todd R. G. Hill
9 Plaintiff, Pro Se

10 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**
11

12 The undersigned party certifies that this brief contains 2,596 words, which complies with the 7,000-
13 word limit of L.R. 11-6.1.

14 Respectfully submitted,

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17

18 March 28, 2025
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20 Todd R.G. Hill
21 Plaintiff, in Propria Persona

22 **Plaintiff's Proof of Service**

23 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-
24
25 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a
26 document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the
27

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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)

CASE 2:23-CV-01298-JLS-BFM

1 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court
2 and (2) all pro se parties who have been granted leave to file documents electronically in the case
3 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service
4 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.
5 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal
6 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.
7
8 Respectfully submitted,

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13 March 28, 2025

14 Todd R.G. Hill

15 Plaintiff, in Propria Persona

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PLAINTIFF'S MOTION FOR RECONSIDERATION OF COURT'S ORDER (DOCKET 248)